

**Lloyd Bell, Individually and as Executor
of the Estate of Betty Whitley Bell, Deceased**

Plaintiff,

vs.

**American International Industries Inc.,
et al.,**

Defendants.

Defendant Whittaker, Clark & Daniels, Inc. (“WCD”) gives notice that it joins in the Motion filed by American International Industries (“AII”) on September 29, 2021 to Vacate Preliminary Protective Order of September 25, 2020 for the reason that WCD is similarly situated in the asbestos/talc litigation as AII.

/s/Tracy E. Tomlin

Tracy E. Tomlin
NC Bar No.: 26267
Attorney for Whittaker, Clark & Daniels, Inc.
Nelson Mullins Riley & Scarborough, LLP
301 South College Street, 23rd Floor
Charlotte, NC 28202
(704) 417-3101 Direct Dial
(704) 417-3227 Dedicated Facsimile
tracy.tomlin@nelsonmullins.com

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2021 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

- **DAVID N. ALLEN**
david.allen@nelsonmullins.com,tina.santiago@nelsonmullins.com,bobbie.kullman@nelsonmullins.com,ben.chesson@nelsonmullins.com
- **MICHAEL ALAN BROWN**
mike.brown@nelsonmullins.com,KATHY.MILLER@NELSONMULLINS.COM
- **BENJAMIN S. CHESSON**
ben.chesson@nelsonmullins.com,tina.santiago@nelsonmullins.com,maria.penuela@nelsonmullins.com,amy.hill@nelsonmullins.com,ariel.roberson@nelsonmullins.com
- **RICHARD A. COUGHLIN**
rcoughlin@foxrothschild.com,tshaw@foxrothschild.com,kcrouch@foxrothschild.com
- **JAMES M. DEDMAN , IV**
jdedman@gwblawfirm.com,jspurling@gwblawfirm.com
- **STEPHANIE G. FLYNN**
sgflynn@foxrothschild.com
- **SAMUEL GARCIA**
sam.garcia@lathropgpm.com,taylor.hamilton@lathropgpm.com,tanya.smith@lathropgpm.com
- **WILLIAM MARC GRAHAM**
bgraham@wallacegraham.com,athompson@wallacegraham.com
- **KURT W. GREVE**
kurt.greve@lathropgpm.com,taylor.hamilton@lathropgpm.com,tanya.smith@lathropgpm.com
- **LEAH C. KAGAN**
lkagan@sgptrial.com
- **NILOFAR KARBASSI**
nilofar.karbassi@lathropgpm.com
- **JOHN H. LAWRENCE**
john.lawrence@klgates.com,courtney.ritter@klgates.com
- **JOSHUA S. LICHTENSTEIN**
jsl@oslaw.com
- **MICHAEL J. MADDERRA**
mmadderra@bblaw.com,epowell@bblaw.com

- **JOSEPH J. MANDIA**
jmandia@sgptrial.com
- **LANITA S. MORGAN**
lanita.morgan@lathropgpm.com,taylor.hamilton@lathropgpm.com,tanya.smith@lathropgpm.com
- **PETER M. MULARCZYK**
pmularczyk@foleymansfield.com
- **ERIKA L. MUSE**
emuse@foleymansfield.com
- **ALVINA M. OELHAFEN**
allie.oelhafen@alston.com,tami.obrien@alston.com
- **KEVIN W. PAUL**
kpaul@dobslegal.com,spepin@dobslegal.com
- **TIMOTHY PECK**
tpeck@foxrothschild.com,kcrouch@foxrothschild.com
- **ERIC PRZYBYSZ**
eprzybysz@sgpblaw.com,chill@sgpblaw.com
- **SCOTT JEFFREY RICHMAN**
scott.richman@nelsonmullins.com,tracy.stanforth@nelsonmullins.com
- **MATTHEW R. SCHROLL**
matt.schroll@nelsonmullins.com
- **WILLIAM MICHAEL STARR**
bill.starr@nelsonmullins.com,kathy.southworth@nelsonmullins.com
- **ERIC A. SWAN**
eric.swan@lathropgpm.com
- **ROBERT E. THACKSTON**
robert.thackston@lathropgpm.com,sam.garcia@lathropgpm.com,tanya.smith@lathropgpm.com,julia.gowin@lathropgpm.com
- **TRACY E. TOMLIN**
tracy.tomlin@nelsonmullins.com,jill.tucker@nelsonmullins.com,christine.greene@nelsonmullins.com
- **MORGAN W. TOVEY**
morgantovey@quinnemanuel.com
- **FRANK J. WATHEN**
fwathen@sgptrial.com,chill@sgpblaw.com,jolson@sgptrial.com,jmuirhead@sgptrial.com

- (No manual recipients)

/s/Tracy E. Tomlin

NC Bar No.: 26267
Nelson Mullins Riley & Scarborough LLP
301 South College Street, 23rd Floor
Charlotte, NC 28202
(704) 417-3101 Direct Dial
(704) 417-3227 Dedicated Facsimile
tracy.tomlin@nelsonmullins.com

Attorney for Whittaker Clark & Daniels, Inc.